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June 11, 2004

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

Listeners come to public radio station broadcasts because of our programming and the quality of our audio. HD Radio's improved sound quality and elimination of distorting interference are important factors that will motivate us to transition to digital broadcasting. However, the decisive factor for my station is the capability to serve supplemental audio programming (or "multiplexing" to use the Commission's term.) This station believes the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either underserved or not served at all.

Our public radio station strives to provide quality, in-depth programming to listeners in our area. Multiplexing of the digital audio signal enables us to provide programs to specific audiences that currently are not served. In its simplest form, this could mean providing our main programming on the primary channel, and an additional service such as music



programming on the supplemental channel. In some instances, language-specific programs serving populations of non-English speaking citizens might also be provided. We feel that small, segmented, and diverse minority groups with growing populations in our area, such as the emerging Hispanic, Russian, Jewish, Greek and Asian communities, could benefit from supplemental audio channel authorization and would support our use of this capability.

The supplemental audio channel provides our public radio station with a very cost-effective means of expanding the quality and quantity of local, diverse programming thereby improving our overall offerings to the community we serve.

Current analog radio technology limits our radio station to providing only one programming service to our community. Digital broadcasting, with multicasting capabilities, will enable our radio station to use existing programs in expanded fashion and to develop new, more varied and diverse programming formats whose appeal may be more targeted and defined.

Another exciting aspect of the supplemental audio channel capability is its tremendous cost effectiveness. It presents enormous efficiencies compared to the difficulty and cost associated with acquiring additional frequencies. The resource savings that digital audio multiplexing will afford can be directed into programming that expands services.

Beyond authorizing the use HD Radio technology to offer supplemental audio channels, the

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FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission. Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.

Sincerely

Anthony S. Brandon

President and General Manager